REMARKS/ARGUMENTS

Claims 24-39 are pending. Claim 24 has been amended. Claims 40-55 have been canceled without prejudice and without disclaimer. The specification has also been amended to correct minor informalities. No new matter has been introduced. Applicants believe the claims comply with 35 U.S.C. § 112.

Applicants would like to thank Examiner Ajay M. Bhatia and Supervisory Patent Examiner Valencia Martin-Wallace for the courteous interview extended to Applicants' representative, Masato Higa, and Applicants' counsel, Chun-Pok Leung, on September 7, 2005. During the interview, the rejection of independent claim 24 as anticipated by Jiang et al. (US 6,453,354) was discussed, and agreement was believed to be reached with regard to proposed amendment to overcome the rejection. The claims have been amended accordingly.

Rejection under 35 U.S.C. § 102

Claims 24-39 stand rejected under 35 U.S.C. § 102(e) as being anticipated by Jiang et al. (US 6,453,354).

Applicants respectfully submit that independent claim 24 as amended is novel and patentable over Jiang et al. because, for instance, Jiang et al. does not teach or suggest a gateway apparatus between a client computer requesting a file access and a file server executing file access processes according to a received file access request from the client computer, wherein a first type protocol processing unit is configured to receive a first type file access request according to the first type protocol from the client computer and respond to the received first type file access request, a first type file system according to the first type protocol being a directory structural file system and the first type file access request includes a path ID indicating a directory including a target file and a first type file ID indicating the target file; wherein a second type file system access unit is configured to receive a file access request from the first type protocol processing unit and issue a second type file access request to a second type file system, the second type file access request including a second type file ID indicating the target file and the second type file ID being a unique ID in the second type

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file system; and wherein the first type file access request is converted into the second type file access request to be used by the second type file system to access a file according to a second type protocol different from the first type protocol.

Jiang et al. discloses at column 8, lines 45-49: "If the first data mover 41 does not own the file system to be accessed, then the first data mover 41 sends a metadata request to the data mover that owns the file system to be accessed." "Instead of reading or writing data, the data mover owning the file system places any required lock on the file, and returns metadata including pointers to data in the file system to be accessed. For example, once the first data mover 41 receives the pointers to the data to be accessed in the second file system 44, then the first data mover communicates read or write data over the bypass path 48." Column 8, line 65 to column 9, line 5. In Figure 17, the modules 301 (CIFS) and 302 (NFS) for network file access protocols are layered over a first group of modules 304, 305, 306 for network communication (Streams, TCP, IP) and a second group of modules 303, 307, 308, 309 (CFS, VFS, UFS, FAT) for file access. The UFS and FAT modules 308, 309 implement alternative physical file systems corresponding to the physical organization of the file systems owned by the data mover and located on a local data storage device such as a cached disk array interfaced to the data mover through the UFS and FAT modules 308, 309. Column 25, lines 51-60.

There is no disclosure or suggestion in Jiang et al. of converting a first type file access request according to a first type protocol for a first type file system into a second type file access request to be used by a second type file system to access a file according to a second type protocol different from the first type protocol.

For at least the foregoing reasons, independent claim 24 and claims 25-39 depending therefrom, are novel and patentable over Jiang et al.
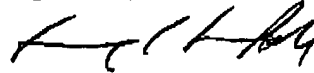
CONCLUSION

In view of the foregoing, Applicants believe all claims now pending in this Application are in condition for allowance. The issuance of a formal Notice of Allowance at an early date is respectfully requested.

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Amdt. dated September 13, 2005
Reply to Office Action of July 8, 2005

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 650-326-2400.

Respectfully submitted,

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